

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: APR 11 2003

SUBJECT: Biological Technical Assistance Group Review
Dayco Corp./L.E. Carpenter Company site

FROM: Mindy J. Penzak, Coordinator
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TO: Stephen Cipot, Remedial Project Manager
New Jersey Remediation Branch (ERRD-NJRB)

The following comments represent the Region II Biological Technical Assistance Group (BTAG) review as discussed at the March 19, 2003 meeting. The document reviewed by the group was the "Focused Feasibility Study Lead-Impacted Soil Remediation," prepared by RMT, Inc., dated February 2003, for the Dayco Corp./L.E. Carpenter Company site located in Wharton Borough, Morris County, New Jersey.

As per previous BTAG memoranda (June 27, 2002, December 15, 2000), an ecological risk assessment should be conducted based on the elevated lead concentrations associated with the soil and in sediment from the drainage ditch, wetlands and the Rockaway River. The risk assessment conducted in 1992 did not include the soil, wetlands, or the ditch. Additionally, the significant change to the volume of lead contaminated soil was not available when the 1992 risk assessment was conducted.

The remediation goal for lead (400 ppm) is based on a New Jersey residential soil cleanup value and, therefore, may not be appropriate for ecological receptors. The Focused Feasibility Study (FFS) does not provide adequate justification that the recommended remedial alternative is ecologically protective. Therefore, an ecological risk assessment should be conducted to develop a remediation goal which is ecologically protective.

The recommended alternative in the document is Alternative 2 which involves the use of soil with lead concentrations greater than 400 ppm as backfill with a soil cover. Based on the information provided, it is not clear that this alternative would be appropriate for ecological receptors. The justification for the reuse of this material involves the Synthetic Precipitation Leaching Procedure (SPLP). However, the purpose of the SPLP is primarily for determining the appropriate disposal procedure and there may be uncertainties associated with the determination of site-specific leachability. Further, the future use of the site has changed from industrial to a recreational park, which may provide more habitat for receptors.

The FFS should indicate if the course subsoil material (grain size greater than 2.5 or 3 inches) being used as backfill will be adjacent to wetlands. This material may act as a drain and remove water from the wetland.

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If you have any questions, comments, or require further information, please contact Michael Clemetson at (732) 321-6712.

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